

I am joining with the ARRL and other Amateur Radio Operators in strongly opposing the petition of SAVI Technology to use 433.9 MHz for unlicensed transmissions and the addition of Section 15.240 to Part 15.

I live in a very densely populated area where transmissions from devices proposed by SAVI would be almost continuous (each device would be allowed to transmit and re-transmit for approximately two minutes and there would be many such devices). Contrary to SAVI's assumption, many Amateur Radio Operators live in urban areas where these devices could be expected to proliferate.

These devices are mobile, making harmful interference impossible to track, much less prove. Thus, prohibited harmful interference to legitimate licensed service would (de-facto) be allowed.

Other countries in Europe and Australia have not allowed high intensity long duration devices such as these to operate in the 420 - 450 MHz band because of proven harmful interference.

In conclusion, SAVI's petition should be denied; Section 15.240 should not be adopted and these devices should not be allowed in the 420 - 450 Mhz band.